

1 **LAW OFFICES OF DALE K. GALIPO**  
2 Dale K. Galipo, Esq. (Bar No. 144074)  
dalekgalipo@yahoo.com  
3 Hang D. Le, Esq. (Bar No. 293450)  
hlee@galipolaw.com  
4 21800 Burbank Boulevard, Suite 310  
Woodland Hills, California, 91367  
Telephone: (818) 347-3333  
5 Facsimile: (818) 347-4118

6 Attorneys for Plaintiffs  
7 L.C., I.H., A.L., and Antonia Salas Ubaldo

8 **UNITED STATES DISTRICT COURT FOR THE**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10  
11 L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
12 individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
13 through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
14 successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
15 guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
16 to Hector Puga; and ANTONIA SALAS  
UBALDO, individually;

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19 Plaintiffs,  
20 vs.  
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22 STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
23 MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA; ROBERT  
24 VACCARI; JAKE ADAMS; and DOES  
6-10, inclusive,

25  
26 Defendants.  
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Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

APPLICATION FOR LEAVE TO  
FILE UNDER SEAL EXHIBITS IN  
OPPOSITION TO DEFENDANTS'  
MOTIONS FOR SUMMARY  
JUDGMENT [LOCAL RULE 79-  
5.2.2(b)]

1 **TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that L.C., I.H., A.L., and Antonia Salas Ubaldo  
4 hereby submits this application to file under seal the following documents and  
5 things:

- 6 • “**Exhibit 6**” – a true and correct copy of the relevant portions of the  
7 transcribed March 3, 2021 interview of Robert Vaccari.
- 8 • “**Exhibit 9**” – a true and correct copy of a cellphone video of the incident  
9 taken by witness Edward Mangerino, produced by County Defendants in the  
10 course of discovery, bates stamped COSB001459.
- 11 • “**Exhibit 20**” – a true and correct copy of the relevant portions of the  
12 transcribed February 22, 2021 Interview of Isaiah Kee.

13 See Declaration of Hang D. Le (“Le Decl.”) ¶ 2.

14 These documents have been designated by Defendants County of San  
15 Bernardino as confidential pursuant to the protective order entered by then-  
16 Magistrate Kenly Kiya Kato on September 19, 2023 (Doc. No. 74).

17  
18 DATED: February 27, 2025                   LAW OFFICES OF DALE K. GALIPO

19  
20 Bv /s/ Hang D. Le  
21 Dale K. Galipo  
22 Hang D. Le  
Attorneys for Plaintiffs

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